

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

ROB RINDE,

Plaintiff

NO. 2:07-CV-00348-JLR

vs.

PLAINTIFF'S INITIAL DISCLOSURES  
PURSUANT TO FRCP 26(a)(1)

CORPORATION OF THE PRESIDENT OF  
THE CHURCH OF JESUS CHRIST OF  
LATTER-DAY SAINTS,

Defendant.

**A. IDENTITY OF INDIVIDUALS WITH DISCOVERABLE INFORMATION**

**1. Plaintiff, Rob Rinde**

c/o GORDON, THOMAS, HONEYWELL, MALANCA, PETERSON & DAHEIM, LLP  
2100 One Union Square  
Seattle, WA 98101

**Plaintiff Rob Rinde** is aware of, among other things, the nature of the abuse he suffered at the hands of Paul Lewis, his communications with representatives of the Mormon Church relating to his abuse (including, but not limited to, communications with Gordon Conger); plaintiff is also aware of the nature and extent of some of the damages he sustained as a result of the abuse. Plaintiff continues to gain knowledge of the nature and extent of his damages. *See, also, information contained in plaintiff's responses to defendant's first interrogatories and requests for production.*

PLAINTIFF'S INITIAL DISCLOSURES - 1 of 5  
156318

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- 1           **2. Kate Hall**  
2           104 East 8<sup>th</sup> Street, Starbuck, MN 56381

3           **Kate Hall** is plaintiff's personal care assistant/long-time friend of plaintiff;  
4           Kate Hall is also aware of communications between plaintiff and  
5           representatives of the Mormon Church including, but not limited to,  
6           communications between plaintiff and Bishops Rosebrough and Pease relating  
7           to Paul Lewis and the Church's admissions that Lewis had abused other  
8           children, Paul Lewis' request to be re-admitted to the Mormon Church, and  
9           relating to the Church's offer to help plaintiff if he ever needed anything  
10          because of the abuse. *See, also, information contained in plaintiff's responses*  
11          *to defendant's first interrogatories and requests for production.*

- 12           **3. Plaintiff's Mother -- Anne Mitchell Rinde**  
13           Grace Home  
14           116 West 2<sup>nd</sup> Street  
15           Graceville, MN 56240

16           The scope of Anne Mitchell Rinde's knowledge was set out in plaintiff's  
17           responses to defendant's first interrogatories and requests for production and in  
18           her deposition in this matter which has already been taken.

- 19           **4. Paul Lewis, Perpetrator of the abuse.**

20           **Paul Lewis** is aware of his abuse of plaintiff and the actions taken, or not  
21           taken, by the Mormon Church, after plaintiff's report of abuse; Paul Lewis is  
22           additionally aware of his status within the Mormon Church and the other  
23           children/members he has abused.

- 24           **5. Plaintiff's Health Care Providers/Therapists:**

25           These providers were previously identified during written discovery,  
26           medical records exchanged and through the depositions of Jan Nix,  
27           Ph.D. and Les Rawlings, Ph.D.

- 28           **6. Members, employees and/or agents of the defendant, including, but not**  
29           **limited to:**

30           Gordon Gonger;  
31           Bishop Johannsen's family members;  
32           Bishop Loren Rosebrough (or Rosenberg);  
33           Bishop Harold W. Pease;  
34           Ken Thevenden;  
35           Bishop Lyman Nielson; and  
36           Bishop Williams.

The scope of these individuals' knowledge was provided in response to Interrogatory No.6 of defendant's first interrogatories and request for production. Additionally, Gordon Conger's knowledge, and the knowledge of Bishop Johannsen's family, was addressed during Mr. Conger's deposition, already taken in this matter.

9. **Other victims of Paul Lewis** – names currently unknown.

10. **Plaintiff's Children:** Travis JeanLuc Rinde, Sebastian Jean-Paul Rinde and LeJune Arianne Rinde. Plaintiff's children have knowledge of, among other things, their father's emotional difficulties.

11. **Plaintiff's Employers:** As identified in Response to Interrogatory No. 19 of defendant's first interrogatories and requests for production to plaintiff. Plaintiff's employers have knowledge of his ability, or inability, to adequately perform job functions.

12. **Washington Child Protective Service, Issaquah Police Department, King County Prosecuting Attorneys' Office:**

Plaintiff and his mother reported and/or discussed the abuse with individuals at these three entities. Discovery is continuing.

13. All other persons identified in response to defendant's first interrogatories and requests for production.

Plaintiff reserves the right to identify additional individuals or parties with discoverable information, including expert witnesses.

Plaintiff further reserves the right to call at trial any and all witnesses identified by the Defendant or which may be identified at a later date by Plaintiff during discovery in this matter.

## **B. DOCUMENTS**

Plaintiff identifies all documents previously produced to defendant in this matter, including all of plaintiff's medical and employment records. Plaintiff reserves the right to disclose additional relevant documents as discovery progresses.

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**C. COMPUTATION OF DAMAGES**

Plaintiff has economic and non-economic damages, including pain and suffering, emotional and psychological injuries, and possible past and future wage loss claims. General damages are a matter for the unique province of the jury. Past and future wage loss will be explained and supported by expert testimony.

**D. INSURANCE AGREEMENTS**

This category is not applicable to Plaintiff.

DATED this 21<sup>st</sup> day of May, 2007.

GORDON, THOMAS, HONEYWELL,  
MALANCA, PETERSON & DAHEIM LLP

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**CERTIFICATE OF SERVICE**

THIS IS TO CERTIFY that on this 21 day of May, 2007, I did serve true and correct copies of the foregoing via ECF procedures by directing delivery to and addressed to the following:

***Counsel for Defendant:***

Charles C. Gordon, Esq.

Jeffrey I. Tilden, Esq.

Michael Rosenberg, Esq.

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Fara Fusaro,  
Legal Assistant to Michelle A. Menely